

**Citizens Coordinating Council
DRAFT Meeting Highlights
October 26, 2005**

The Citizens Coordinating Council for the GE-Housatonic River site met on October 26, 2005 at the Berkshire South Community Center in Great Barrington, MA. The purpose of this CCC meeting was to discuss GE's proposal to EPA for Interim Media Protection Goals (IMPGs) for the Rest of the River (ROR) project. Forty-five individuals attended the meeting, including several new CCC members who attended after participating in an orientation session. Suzanne Orenstein facilitated the meeting.

Interim Media Protection Goal Presentation and Discussion

Andy Silfer, representing GE, presented an overview of GE's IMPG Proposal. He explained that GE's proposed IMPGs are intended to be used to guide the development of potential remediation scenarios in the Corrective Measures Proposal for the ROR. The IMPGs take into account the final Human Health Risk Assessment and Ecological Risk Assessment developed by EPA. The Consent Decree specifies that GE has the responsibility for developing the proposed goals.

Susan Svirsky, EPA Project Manager for the ROR, noted that EPA will respond to GE's proposal in late November/early December. She noted that EPA has the option to approve the GE proposal, issue a conditional approval with recommended modifications, disapprove it and describe the deficiencies, or write its own version. The final decision establishing the goals is EPA's. In addition, she noted that EPA is accepting informal public comment on the IMPG proposal through November 15th. Copies of the IMPG Proposal are available for review in the repositories and it is also posted on the EPA web site under Rest of River reports.

Mr. Silfer reviewed the major points in the IMPG proposal. A copy of GE's presentation slides can be viewed at <http://www.epa.gov/region1/ge/publiceventsandmeetings/237423.pdf>.

Questions and comments on the presentation are summarized below and included the following points.

- One way to describe the role of the IMPGs is that they indicate the level of PCB contamination that will be acceptable and left in the river or floodplain after remediation is completed.
- If the IMPGs are based on information from the final Human Health and Ecological Risk Assessments, GE should have used the data obtained in those peer-reviewed documents only, and refrained from indicating its own separate and less conservative assumptions and proposals. GE responded to these comments by noting that, based on its review of the science, it disagreed with some assumptions in the final risk assessments, for example, that humans are more sensitive to PCB contamination than animals. GE presented an alternative set of IMPGs in order to show EPA and the CCC what the IMPGs would look like if the GE comments on those documents had been included in the final version.
- It is not acceptable to have higher proposed allowable levels for non-cancer risk given that emerging science is demonstrating that the non-cancer risks, especially endocrine disruption, may in fact be greater than the cancer risks.
- The GE proposed goals for acceptable PCBs in fish are so high that the fish caught with the proposed levels would not meet FDA goals for fish sold commercially.
- Many of the proposed levels are too high to restore the Housatonic to a fishable, swimmable river, which is an important goal for local communities.

- The proposed levels using the peer-reviewed risk assessments published by EPA are also too high. The numbers for acceptable levels in some cases exceed the contamination levels for which soil must be sent to a landfill operated under the Toxics Substance Control Act standards. They should be reconsidered.
- GE stated in response to a question from the public that some of its numbers are based on using toxicity to chickens for wood ducks. That is not an acceptable extrapolation.
- The proposed narrative goals are too vague to be useful in assuring protective cleanup levels.
- In response to a question about what the proposed standards mean for the extent of cleanup that could be proposed for Connecticut, Mr. Silfer clarified that the standards would apply to the entire river. The information about the extent of clean up will come later in the Corrective Measures Proposal and Study.
- In response to questions about what EPA will do with the GE proposal, Tim Conway and Susan Svirskey reiterated that EPA will decide whether to approve the proposal, disapprove it, conditionally approve it with required modifications, or EPA could propose IMPGs; this decision will be made in late November/early December. Regarding the IMPGs and the future Corrective Measures Study and Corrective Measures Proposals, EPA is responsible for review and ultimate approval of all of the submittals from GE. After GE proposes corrective measures, EPA will issue a Proposed Plan outlining the clean up for public comment. After consideration of the comments, EPA makes the final decision about the clean up plan. If GE, the states or public and EPA do not agree, there are dispute resolution steps, and administrative and legal appeal processes that can be used prior to implementing EPA's final decisions. Upon completion of all appeals, GE is required to implement the final cleanup plan.

Next Steps on IMPG Proposal: **CCC members are invited to submit written comments to EPA by November 15, 2005.** Comments should be submitted in writing to Susan Svirskey, 10 Lyman St., Pittsfield, MA 01201 or by email to svirskey.susan@epa.gov. If individual CCC members would like a CD version of the IMPG proposal, Andy Silfer will provide one on request.

Scheduling of Future CCC Meetings

During the discussion of the schedule of future meetings, there was specific discussion about scheduling meetings of the CCC in Connecticut. EPA proposed two meetings with interested groups in CT, one in February 2006, and one later in 2006. A Connecticut representative stated that four meetings for a CT Subcommittee of the CCC were agreed upon in the past, and that four were still needed. A representative from EPA noted that there was low attendance for some past CT meetings, and noted that EPA is willing to support the proposed two meetings per year in CT. The CT representative further noted that there is renewed interest in CT, as was evident in the attendance of 20 people at the June 28, 2005 meeting.

Another scheduling issue concerned the need to schedule CCC meetings on a consistent day of the month. At the September 7 CCC meeting, the CCC agreed to try to meet on the second Wednesday of the month, rather than on the first Wednesday date used in the past, to accommodate the needs of the lead representative from DEP. A CCC member reiterated opposition to that decision and noted that changing the schedule could affect continuity.

The CCC developed a proposed schedule after discussing it in some detail. A refined schedule was later distributed by e-mail on November 1, and it is attached to this summary.

The meeting adjourned at 8 PM.

CCC Meeting Schedule¹

Date		Topic
December 14, 2005	Optional Meeting ² (EPA Office, 10 Lyman St. Pittsfield)	Newell St. and Allendale School
January 18, 2006	CCC Meeting	Model Validation for Rest of River
February 1, 2006	CT Meeting	IMPGs, other topics TBD
February 8, 2006	Optional Meeting (EPA Office, Pittsfield)	TBD
March 29 ³	CCC Meeting	Results of Bench Study of Silver Lake Capping Proposal
April 12	CCC Meeting	Panel on Capping and Dredging
May, 2006	Public Meeting	Model Validation Peer Review
June 14, 2006	Optional Meeting (EPA Office, Pittsfield)	TBD
September 13, 2006 Technologies	CCC Meeting	Alternative Remediation
September 27, 2006	CT Meeting	TBD

¹ Portions of this schedule were discussed at the October 26, 2005 CCC meeting. Additional specific dates were proposed by EPA after the meeting.

² Optional meetings are not full CCC meetings, but are open to all CCC members who would like to have informal discussion with EPA. Most of the optional meetings will be held in Pittsfield at the EPA office.

³ The March meeting is scheduled to be two weeks before the April meeting to sequence it closely with the Panel on Capping and Dredging.